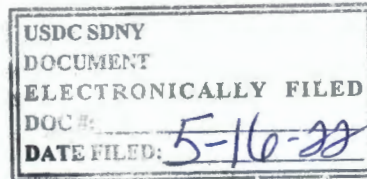


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MEMO ENDORSED

May 16, 2022



VIA ECF

Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Abdel-Wadood, 19 Cr. 233

Dear Judge Kaplan:

I write, with the consent of the government (AUSA Andrew Thomas) to request permission for Mustafa Abdel-Wadood to travel to Sicily from May 25 to May 31 to attend a wedding there.

As the Court knows, Mr. Abdel-Wadood has been "out" on bail since his arrest three years ago. He has pleaded guilty and agreed to testify against Arif Naqvi, who was the head of Abraaj Capital and who is accused of defrauding investors and stealing from Abraaj. The government (and Mr. Abdel-Wadood) have been waiting for Mr. Naqvi to be extradited, and it has proven to be a long wait with no end in immediate sight. During the last three years, Mr. Abdel-Wadood's bail limits have been extended, and he is now at liberty to travel the continental United States with the approval of Pretrial Services. He had complied with the conditions of his release at all times.

The wedding in Sicily is that of Onsi Sawiris, the son of Naguib Sawiris and Ghada Barsoum, to Olivia Farhat. Naguib Sawiris was Mr. Abdel-Wadood's boss for the first ten years of his professional career and came to Mr. Abdel-Wadood's assistance after his arrest by helping him obtain a lawyer and co-signing his bail bond. Mr. Sawiris has also supported Mr. Abdel-Wadood's family while Mr. Abdel-Wadood has been in New York. Attending the wedding (with his wife Neemat) would be a sign of respect and affection for someone who has been a mentor and close friend.

To travel, Mr. Abdel-Wadood would require both his Maltese and Egyptian passports, the former to enter Italy and the latter to help re-enter the United States. I have spoken to Mr. Abdel-Wadood's Pretrial Services Officer, P.O. Stephen Boose. As is its policy, Pretrial Services takes no position on international travel. If travel were approved, Mr. Abdel-Wadood would provide airline tickets to Pretrial Services, showing his departure and return and would

Paul Shechtman
Partner

T: +1.212.508.6107 F: +1.800.404.3970
31 West 52nd Street, 19th Floor, New York, New York 10019-6118
paul.shechtman@bracewell.com bracewell.com

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provide an address in Sicily and any other necessary information. He would obtain his passports the day before traveling (May 24) and return them to Pretrial Services promptly on his return.

I thank the Court for its attention to this request.

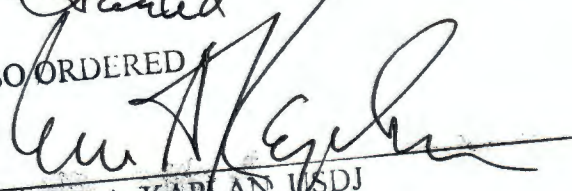
Respectfully submitted,

/s/ Paul Shechtman

Paul Shechtman

PS:wr

cc: AUSA Andrew Thomas
P.O. Stephen Boose

Granted
SO ORDERED

LEWIS A. KAPLAN, USDJ
5/16/22